

AKERMAN LLP

1160 TOWN CENTER DRIVE, SUITE 330
LAS VEGAS, NEVADA 89144
TEL.: (702) 634-5000 – FAX: (702) 380-8572

DARREN T. BRENNER, ESQ.
Nevada Bar No. 8386
ERIC S. POWERS, ESQ.
Nevada Bar No. 12850
AKERMAN LLP
1160 Town Center Drive, Suite 330
Las Vegas, Nevada 89144
Telephone: (702) 634-5000
Facsimile: (702) 380-8572
Email: darren.brenner@akerman.com
Email: eric.powers@akerman.com

Attorneys for Defendant Bank of America, N.A.

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

PERLA A. HERNANDEZ,

Plaintiff,

v.

BANK OF AMERICA, N.A.

Defendant.

Case No.: 2:14-cv-01171-RFB-GWF

**MOTION FOR EXTENSION OF TIME
TO FILE RESPONSE TO PLAINTIFF'S
MOTION FOR SUMMARY JUDGMENT**

[FIRST REQUEST]

Defendant Bank of America, N.A. (**BANA**), by and through its attorneys, hereby submits its motion for an eleven (11) day extension of time to file a response to Perla A. Hernandez' (**Plaintiff**) Motion for Summary Judgment [ECF No. 21], which Plaintiff filed on October 9, 2015. In support thereof, BANA states as follows:

1. BANA has attempted to consult with Plaintiff several times regarding stipulating to an extension of time, but has been unable to reach Plaintiff. Counsel for BANA did speak with someone who claimed to be Plaintiff's sister who stated she would give the message to Plaintiff; however, to date BANA has not received any response.

2. BANA's response is currently due on November 2, 2015, and the time in which to file the response has not yet expired.

3. BANA's motion is not intended for the purpose of delay. No previous extensions of time have been requested or obtained from Plaintiff or granted by this Court.

1 WHEREFORE, BANA respectfully moves this Court for an Order extending the time in
2 which it may file a response to Plaintiff's Motion for Summary Judgment up to and including
3 November 13, 2015.

4 DATED this 19th day of October, 2015.

5
6 **AKERMAN LLP**

7 /s/ Eric S. Powers, Esq.

8 DARREN T. BRENNER, ESQ.

9 Nevada Bar No. 8386

ERIC S. POWERS, ESQ.

10 Nevada Bar No. 12850

AKERMAN LLP

11 1160 Town Center Drive, Suite 330

Las Vegas, Nevada 89144

Telephone: (702) 634-5000

Facsimile: (702) 380-8572

12 *Attorneys for Defendant Bank of America, N.A.*

13 IT IS SO ORDERED:

14
15 

16 RICHARD F. BOULWARE, II

17 United States District Judge

18 DATED this 26th day of October, 2015

19 **CERTIFICATE OF SERVICE**

20 I HEREBY CERTIFY that on October 20, 2015 and pursuant to Fed. R. Civ. P. 5(b), I served
21 via the CM/ECF electronic filing system, and/or mailed in the U.S. Mail, postage prepaid, a true and
22 correct copy of the foregoing **MOTION FOR EXTENSION OF TIME TO FILE RESPONSE**
23 **TO PLAINTIFF'S MOTION FOR SUMMARY JUDGMENT** to:

24 Perla A. Hernandez
25 1300 Paraiso Street
Las Vegas, NV 89117

26 /s/ Julia M. Diaz

27 An employee of AKERMAN LLP

AKERMAN LLP

1160 TOWN CENTER DRIVE, SUITE 330
LAS VEGAS, NEVADA 89144
TEL.: (702) 634-5000 – FAX: (702) 380-8572